

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MICHAEL TED LAMB,	§	
TDCJ-CID # 790214	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 2:11-cv-00027
	§	
RICHARD L. CRITES, ET AL.,	§	
Defendants.	§	

PLAINTIFF'S FIRST AMENDED TRIAL WITNESS LIST

1. Michael Ted Lamb – TDCJ #790214
c/o Clif Alexander
Sico, White, Hoelscher & Braugh, L.L.P
802 N. Carancahua, Suite 900
Corpus Christi, Texas 78401
Phone: (361) 653-3300
Facsimile: (361) 653-3333

Plaintiff

Michael Lamb will testify regarding the retaliation that he has experienced at all material times while at the McConnell Unit in relation to his bringing *Lamb v. Mendoza et al.* in the United States District Court for the Southern District, Corpus Christi Division, Civil Action number 2:07-cv-00449 in 2007 against prison officials at the McConnell Unit.

2. Daniel Ellis Taylor – TDCJ #700429
William G. McConnell Unit
3001 S. Emily Drive
Beeville, Texas 78102

Witness with Knowledge of Relevant Facts

Daniel Taylor will testify regarding the retaliation that Plaintiff experienced at all material times while at the McConnell Unit in relation to Plaintiff bringing *Lamb v. Mendoza et al.* in the United States District Court for the Southern District, Corpus Christi Division, Civil Action number 2:07-cv-00449 in 2007 against prison officials at the McConnell Unit.

3. Barbara Thomas
4007 Darrell Lane
Tyler, Texas 75701
(903) 561-9766

Plaintiff's Sister and Witness with Knowledge of Relevant Facts

Barbara Thomas has personal knowledge of and may testify regarding the retaliation experienced by Plaintiff after bringing *Lamb v. Mendoza et al.* in the United States District Court for the Southern District, Corpus Christi Division, Civil Action number 2:07-cv-00449 in 2007 against prison officials at the McConnell Unit.

4. Captain Jacquelyn Jameson
c/o Nadine Phillpotts, A.A.G.
Office of the Attorney General
P.O. Box 12548, Capitol Station
Austin, TX 78711
Phone: (512) 463-2080

Defendant

Captain Jameson is expected to testify regarding her knowledge of Plaintiff's allegations, and her involvement with this matter. This witness may testify as to any other facts or circumstance within her knowledge relevant to this suit.

5. Correctional Officer Lisa Hassette
c/o Nadine Phillpotts, A.A.G.
Office of the Attorney General
P.O. Box 12548, Capitol Station
Austin, TX 78711
Phone: (512) 463-2080

Defendant

Officer Hassette is expected to testify regarding her knowledge of Plaintiff's allegations, and her involvement with this matter. This witness may testify as to any other facts or circumstance within her knowledge relevant to this suit.

6. Correctional Officer Darlene Barfoot
c/o Nadine Phillpotts, A.A.G.
Office of the Attorney General
P.O. Box 12548, Capitol Station
Austin, TX 78711
Phone: (512) 463-2080

Witness with Knowledge of Relevant Facts

Officer Barfoot is expected to testify regarding her interaction with Plaintiff and her knowledge regarding his claims. This witness may testify as to any other facts or circumstance within her knowledge relevant to this suit.

Plaintiff reserves the right to revise this witness list prior to trial and also reserves the right to call any witness called by Defendants who is not listed on Plaintiff's witness list.

Respectfully submitted,

By: /s/ Clif Alexander
Clif Alexander
State Bar No. 24064805
Federal I.D. No. 1138436
SICO, WHITE, HOELSCHER & BRAUGH, L.L.P
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ATTORNEY FOR THE PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 12th day of November, 2012, a true and correct copy of the above and foregoing document was served upon the following counsel of record via the Court's electronic filing system and/or Certified U.S. Mail, Return Receipt Requested, in accordance with the Federal Rules of Civil Procedure.

Nadine Phillpotts
Assistant Attorney General
P.O. Box 12548, Capitol Station
Austin, Texas 78711

Attorney for Defendants Jacquelyn Jameson and Lisa Hassette

/s/ Clif Alexander
Clif Alexander